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*Attorneys for Philippe Schaad  
and Shooting Gallery Publications, LLC*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

UNITED STATES OF AMERICA,

Plaintiff,

v.

LAWRENCE J. SEMENZA II; ROMIE  
SEMENTA; LAWRENCE J. SEMENZA,  
LTD; PHILIPPE SCHAAD; SHOOTING  
GALLERY PUBLICATIONS, LLC; TESLA,  
INC.,

Defendants.

Case No.: 2:22-cv-02059-APG-DJA

**STIPULATION AND ORDER  
REGARDING BRIEFING AND  
HEARING DATE ON PLAINTIFF'S  
MOTION TO COMPEL (FIRST  
REQUEST)**

Pursuant to Local Rules IA 6-1, LR IA 6-2, and LR 26-1, Plaintiff the United States of America ("Plaintiff"), Defendants Lawrence J. Semenza II, Romie Semenza, Semenza LTD, Philippe Schaad, and Shooting Gallery Publications, LLC ("Defendants") (collectively the "Parties"), by and through their respective undersigned counsel of record, hereby stipulate and agree:

1. On February 13, 2024, the Parties submitted, and the Court approved a second stipulation extending the scheduling deadlines. As set forth in the stipulation the Parties were meeting and conferring on two outstanding discovery issues, related to Plaintiff's claims of deficiencies in Defendants' responses to written discovery and a FRCP 30(b)(6) deposition of Plaintiff.

1           2.       On March 21, 2024, Plaintiff filed a motion to compel regarding certain responses  
2 to requests for production of documents and interrogatories and requested oral argument on the  
3 motion. *See* ECF 31.

4           3.       On March 22, 2024, the Court issued a minute order setting a hearing on Plaintiff's  
5 motion to compel for May 16, 2024, at 10:00 am. *See* ECF No. 32.

6           4.       On March 22, 2024, Defendants Philippe Schaad and Shooting Gallery  
7 Publications, LLC served a Third Supplemental Disclosure of Documents and Witnesses.

8           5.       The Parties continued to meet and confer on the outstanding discovery issues, and  
9 on April 2, 2024, the Parties conducted another meet and confer to discuss Plaintiff's claims  
10 surrounding deficiencies in responses to requests for production of documents and interrogatories  
11 and the 30(b)(6) deposition of Plaintiff.

12          6.       The Parties were able to agree on the issues surrounding a 30(b)(6) deposition of  
13 Plaintiff but are still attempting to work through the issues regarding Plaintiff's claims of  
14 deficiencies in responses to requests for production of documents and interrogatories. Thus, to  
15 facilitate additional time for Defendants to respond to Plaintiff's motion to compel, the Parties  
16 agreed to set a briefing schedule. Moreover, as part of this conference the Parties discussed the  
17 currently scheduled hearing date of May 16, 2024, on Plaintiff's motion to compel, and it was  
18 advised that counsel for Defendants Philippe Schaad and Shooting Gallery Publications, LLC  
19 would be out-of-town and unavailable on this date. Further, since Plaintiff's counsel would have  
20 to travel to Las Vegas for the 30(b)(6) deposition of Plaintiff, it was discussed that if the Court's  
21 calendar permitted it would be most efficient to have the hearing set on either May 13, 2024, May  
22 14, 2024, or May 15, 2024, and depending on the date the hearing is rescheduled the Parties could  
23 schedule Plaintiff's 30(b)(6) deposition on one of these alternative dates.

24          7.       For the above reasons, and for good cause shown, the Parties therefore seek to set a  
25 briefing schedule on Plaintiff's motion to compel, extending Defendants' response deadline by  
26 two-weeks, and Plaintiff's reply as follows:

- 27                   a. Defendants' opposition to Plaintiff's motion to compel (ECF No. 31) shall  
28                   be due on or before April 19, 2024.

b. Plaintiff's reply in support of Plaintiff's motion to compel (ECF No. 31) shall be due on or before May 2, 2024.

8. Moreover, subject to the Court's availability, the Parties request that the hearing on Plaintiff's motion to compel be rescheduled to either May 13, 2024, May 14, 2024, or May 15, 2024.

9. This stipulation is being entered into good faith and not for the purposes of delay.

DATED this 18th day of April, 2024.

DATED this 18th day of April, 2024.

MCMENEMY HOLMES PLLC

U.S. DEPT. OF JUSTICE, TAX DIVISION

By: /s/ Dustun H. Holmes  
Dustun H. Holmes, Bar #12776  
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By: /s/ Kenton McIntosh  
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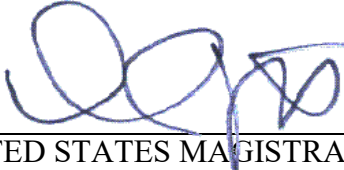
DATED this 18th day of April, 2024.

PISANELLI BICE PLLC

By: /s/ Todd L. Bice  
Todd L. Bice, Bar #4534  
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Las Vegas, Nevada 89101

*Attorneys for Lawrence J. Semenza II, Romie  
Semenza and Lawrence J. Semenza, Ltd.*

IT IS SO ORDERED. IT IS FURTHER ORDERED that the hearing on Plaintiff's motion to compel (ECF No. 31) is **ADVANCED** to **May 14, 2024 at 10:00 A.M.**

  
UNITED STATES MAGISTRATE JUDGE

DATED: 4/22/2024